

Comments on September 30 Draft of B160-03
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Overall, I am impressed the document has come so far so fast from a pretty meager state a very few months ago. But here are some comments, nonetheless,

- 1) The major contributions of this volume and our process seem to be two-fold: a) there is a very nice enumeration of the rich variety of options available to manage California's water supply system, and b) the state makes its policy clear that it cannot have the main responsibility for what are essentially local water supply problems. (This has been the de facto policy for a decade now.) These are really great and fundamental contributions, but they only take us so far. The problem is somewhat set up for the analysis that the Advisory Committee has said it would like to see done.
- 2) Overall, I suggest a little different spin to the report: Change the title to, "Investment Approaches for California's Water Future." Then lay out the investment approach, with items for a balanced portfolio. Present consensus policy conclusions. Then lay out the next steps, so this waypoint ends with some forward momentum towards something really solid for next time – or an attempt at such.
- 3) Title: The idea that this is an "investment guide" doesn't jive well for me, although I can understand the attraction of this term for legislative-level folks. To me there is very skimpy and ad hoc analysis behind the quantifications of the performance and costs for each option. Potential positive interactions of these management options are essentially neglected. At its worse, the "investment guide" table is a little like the gap analysis of yesteryear, except that costs have been added, although I don't really know to whom these costs apply and it is unclear if the water quantity numbers are applied or consumptive use. I realize the need to present a highly distilled version of conclusions to the legislative level, but if there is little behind the bumper-sticker version, then this will eventually be found out as the legislature gets into the details – to the long-term detriment of the DWR and its leadership capability in this field.
- 4) The best part of the main table is that it makes it very clear that multiple options are desirable. A conclusion that I agree with is that most of these items are far more likely to be more effective and cost-effective than new surface storage at addressing water supply problems. It pains me greatly that this and previous B160s have not sought to demonstrate systematically either the technical effectiveness, cost-effectiveness, or net benefits of various management options (and their combinations), even though such technology and analytical capability is now quite available (in imperfect form, but nonetheless adequate for such demonstrations).
- 5) The management strategy write-ups are of uneven quality. Some write-ups offer details, references, and insights, while others are just yackety-yak, with very little information content. Try to keep a high overall standard.

- 6) One management strategy that is desperately needed is something on “coordinated and cooperative strategy development”, as outlined in a set of comments sent in last week. This is much needed if regional approaches are to be workable and effective.

Some more specific comments:

- 7) p. ES-3, last bullet last sentence, should change to “Future versions of the California Water Plan will update these estimates and provide a more integrated picture of water management options and their performance.”
- 8) Precipitation enhancement: There is too much emphasis on weather modification/precipitation enhancement in this report. I do not see this as being much more than a marginal reliable supply. If this technology were successful and employed widely, it could set the stage for some nasty inter-regional and inter-state conflicts. Fortunately, a recent National Research Council report places the role of this strategy in a more scientifically reasonable perspective – small likelihood of providing a great deal more water.
- 9) pp. 1-5 and 1-6. These tables are odd. How were they filled? They seem like yackety-yak, with no real information content.
- 10) p. 1-7, 3rd paragraph. This sentence should read, “Although presented as separate strategies, the potential for positive interactions among strategies is important.” For example, water transfers, conservation, and conjunctive use are much more potent together than separately.
- 11) p. 2-5. How do Native American tribes merit so much space, relative to state, federal, and local governments? This seems dumb. The Tribes are largely unimportant for California water management. They have a few water problems and their role in the overall system is vanishingly small in almost all cases.
- 12) p. 2-8. Why does the public trust doctrine get so much space relative to the more functionally important legal aspects of the system? This also seems dumb. It is important for the Plan to put things in something close to proportionate perspective.
- 13) p. 2-9. There should be a paragraph discussing the SWRCB’s water rights permitting system, which is arguably more important than the riparian and appropriative doctrines in their original forms.
- 14) p. 2-10. Tribal water rights are very small in California. They merit little space, much less space than they are given here.
- 15) p. 2-11. Under “Water Contracts”, more than CVP and SWP contracts are important. Regional and inter-regional water contracts involving local and regional contracts are becoming VERY important, such as IID and MWD. SFPUC, MWD, SCVWD, Kern, etc. etc. etc. all have important water contracts outside of CVP and SWP. A few

sentences need to be added to this effect. Discussing inter-local and inter-regional contracts is important to the regional responsibility theme of the Plan.

16) p. 4-15, Data collection. Suggest changing title to, “Data collection and development”. This seems to fit better with the content and intent of the paragraph.

Well, that’s enough grouching for now. There is a fair bit of good stuff in the report; keeping up the quality of the rest of the report, seems desirable to help us retain the best ideas and recommendations.